

EXHIBIT 4

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 -----X
5 RUBY FREEMAN and WANDREA' MOSS,

6 PLAINTIFFS,

7 -against-

8 Case No.:

9 24-cv-6563 (LJL)

10 RUDOLPH W. GIULIANI,

11 DEFENDANT .
12 -----X

13 DATE: December 31, 2024

14 TIME: 9:10 A.M.

15 CONFIDENTIAL REALTIME VIDEOTAPED
16 DEPOSITION of the Non-Party Witness,
17 DR. MARIA RYAN, taken by the Plaintiffs,
18 pursuant to a Subpoena and to the Federal
19 Rules of Civil Procedure, held remotely, at
20 all parties' locations, before Karyn
21 Chiusano, a Notary Public of the State of
22 New York.
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25

<p style="text-align: right;">Page 2</p> <p>1 2 A P P E A R A N C E S: 3 4 WILLKIE FARR & GALLAGHER, LLP Attorneys for the Plaintiffs 5 RUBY FREEMAN and WANDREA' MOSS 787 Seventh Avenue 6 New York, New York 10019 BY: M. ANNIE HOUGHTON-LARSEN, ESQ. J. TYLER KNOBLETT, ESQ. mhoughton-larsen@willkie.com jknobblett@willkie.com 7 8 9 GOLDBERG SEGALLA LLP Attorneys for the Deponent 10 MARIA RYAN 711 3rd Avenue ~ 19th Floor New York, New York 10017 11 BY: ADAM KATZ, ESQ. akatz@goldbergsegalla.com 12 13 CAMMARATA & De MEYER P.C. Attorneys for the Defendant 14 RUDOLPH W. GIULIANI 456 Arlene Street 15 Staten Island, NY 10314 BY: JOSEPH CAMMARATA, ESQ. joe@cdlawpc.com 16 17 18 19 ALSO PRESENT: 20 JEREMY KOVACS, Videographer JOANNA LAMBERTA, Law Clerk 21 * * * 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN 2 THE VIDEOGRAPHER: Good 3 morning. 4 We are going on the record at 5 9:10 A.M. Eastern Standard Time on 6 Tuesday, December 31st, 2024. 7 Please note that this 8 deposition is being conducted 9 virtually. 10 Quality of the recording 11 depends on the quality of the camera 12 and internet connection of 13 participants. 14 What is heard from the witness 15 and seen on the screen is what will 16 be recorded. 17 Audio and video recording will 18 continue to take place unless all 19 parties agree to go off the record. 20 This is Media Unit Number 1 of 21 the video-recorded deposition of 22 Dr. Maria Ryan taken by counsel for 23 Plaintiff in the matter of 24 Ruby Freeman and Wandrea' Moss verse 25 Rudy W. Giuliani and Andrew</p>
<p style="text-align: right;">Page 3</p> <p>1 2 F E D E R A L S T I P U L A T I O N S 3 4 5 IT IS HEREBY STIPULATED AND AGREED by and 6 between the counsel for the respective 7 parties herein that the sealing, filing and 8 certification of the within deposition be 9 waived; that the original of the deposition 10 may be signed and sworn to by the witness 11 before anyone authorized to administer an 12 oath with the same effect as if signed 13 before a judge of the Court; that an 14 unsigned copy of the deposition may be used 15 with the same force and effect as if signed 16 by the witness 30 days after service of the 17 original and one copy of same upon counsel 18 for the witness. 19 20 IT IS FURTHER STIPULATED AND AGREED that 21 all objections, except as to form, are 22 reserved to the time of trial. 23 24 * * * * 25</p>	<p style="text-align: right;">Page 5</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN 2 Giuliani -- Andrew Rudolph W. 3 Giuliani [sic]. 4 This case is filed in the 5 United States -- United States 6 District Court for the District of 7 Columbia, Case Number 21-3354 [sic]. 8 My name is Jeremy Kovacs and I 9 am your certified legal video 10 specialist. Your court reporter 11 today is Karyn Chiusano, and we are 12 both from the firm Veritext Legal 13 Solutions. 14 I am not related to any party 15 in this action nor am I financially 16 interested in the outcome. 17 If there are any objections to 18 these proceedings, please state them 19 at the time of your appearance. 20 Not hearing anything, all 21 counsel will be noticed on the 22 stenographic record and the court 23 reporter may swear in the witness? 24 THE COURT REPORTER: Can you 25 raise your right hand, please?</p>

<p style="text-align: right;">Page 162</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 Joseph Ricci, was marked for</p> <p>3 identification as of this date by the</p> <p>4 Reporter.)</p> <p>5 Q. Okay. Dr. Ryan -- I --</p> <p>6 MS. HOUGHTON-LARSEN: I think</p> <p>7 this should be Exhibit 5. I think we</p> <p>8 already have an Exhibit 4.</p> <p>9 MS. LAMBERTA: Apologies. I</p> <p>10 will remark it.</p> <p>11 Q. Sorry, Dr. Ryan. There are</p> <p>12 some things that are easier about a Zoom</p> <p>13 deposition and some things that are harder,</p> <p>14 but I appreciate you sticking with me.</p> <p>15 All right. Do you see this</p> <p>16 document, Dr. Ryan --</p> <p>17 A. I can't --</p> <p>18 Q. -- which is Exhibit 5?</p> <p>19 A. It needs to be blown up just a</p> <p>20 little bit.</p> <p>21 Q. Okay. Great.</p> <p>22 Now can you see it?</p> <p>23 A. Yep.</p> <p>24 Q. Okay. Do you recognize this?</p> <p>25 I mean, take a minute to review it, first</p>	<p style="text-align: right;">Page 164</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 But I don't think any of the</p> <p>3 Giuliani Partners' are in existence</p> <p>4 anymore; Ryan Medrano's either. I don't --</p> <p>5 I think those are all gone.</p> <p>6 Q. Do you recall the last time you</p> <p>7 tried to access that e-mail account?</p> <p>8 A. No, I don't.</p> <p>9 Q. Do you think it would've been</p> <p>10 in the last year?</p> <p>11 MR. CAMMARATA: Objection.</p> <p>12 A. I don't think so.</p> <p>13 Q. Thank you.</p> <p>14 Do you have an understanding as</p> <p>15 to why Joseph Ricci was sending this e-mail</p> <p>16 to you about it -- why he was sending this</p> <p>17 e-mail to you?</p> <p>18 A. Yes.</p> <p>19 Because he was hoping that I</p> <p>20 would flag it for the mayor. Absolutely.</p> <p>21 Q. Okay.</p> <p>22 A. And this -- this used to happen</p> <p>23 quite frequently when people tried to --</p> <p>24 the mayor does not do e-mail, does not do</p> <p>25 text.</p>
<p style="text-align: right;">Page 163</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 of all, and then can you tell me if you</p> <p>3 recognize this exhibit?</p> <p>4 (Witness reviews document.)</p> <p>5 A. I don't. But I'm not -- I mean</p> <p>6 I don't really but --</p> <p>7 Q. And can you see that this</p> <p>8 appears to be an e-mail sent on</p> <p>9 November 30, 2023, by Joseph Ricci --</p> <p>10 A. Yep.</p> <p>11 Q. -- to</p> <p>12 TruthandJustice4U@protonmail.com and</p> <p>13 maria.ryan@giulianipartners.com; cc</p> <p>14 ryan.medrano@giulianipartners.com?</p> <p>15 A. I do.</p> <p>16 Q. Subject line: "Filing of tax</p> <p>17 returns"?</p> <p>18 A. I do.</p> <p>19 Q. Okay. And TruthandJustice4U,</p> <p>20 is that Mr. Giuliani's e-mail address?</p> <p>21 A. It is.</p> <p>22 Q. And Ryan --</p> <p>23 maria.ryan@giulianipartners.com, is that an</p> <p>24 e-mail address associated with you?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 165</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 And it's -- became habit that</p> <p>3 people would either cc me or Ted or</p> <p>4 somebody to flag him that he's got a</p> <p>5 meeting or someone needs to talk to him.</p> <p>6 Q. Do you think that</p> <p>7 most e-mail -- e-mails --</p> <p>8 MS. HOUGHTON-LARSEN: Pardon</p> <p>9 me.</p> <p>10 Q. -- most e-mails to</p> <p>11 Mr. Giuliani, nowadays, likely cc either</p> <p>12 you or Mr. Goodman or Mr. Medrano to make</p> <p>13 sure the mayor sees them?</p> <p>14 MR. CAMMARATA: Objection.</p> <p>15 A. I could not say that to be</p> <p>16 true, no. I -- I think some of the</p> <p>17 old-timers know, like Joe Ricci knows to do</p> <p>18 that, but I can't think -- and then, his</p> <p>19 predecessor, Lisa Osofsky, would call me to</p> <p>20 alert the mayor that he has something in</p> <p>21 his e-mail.</p> <p>22 But I wouldn't say that's an</p> <p>23 ongoing practice with other people.</p> <p>24 Q. Okay.</p> <p>25 MS. HOUGHTON-LARSEN: Can we</p>

<p style="text-align: right;">Page 166</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 mark Tab FFF, Joanna, as Plaintiffs'</p> <p>3 Exhibit 6, please?</p> <p>4 MS. LAMBERTA: "FFF," you said?</p> <p>5 MS. HOUGHTON-LARSEN: Yep.</p> <p>6 MS. LAMBERTA: Okay. Sure.</p> <p>7 Q. And just while Joanna's pulling</p> <p>8 that up, the November 30th, 2023 e-mail</p> <p>9 from Mr. Ricci that we just looked at, did</p> <p>10 you produce that document to Plaintiffs?</p> <p>11 A. I don't have access to that</p> <p>12 e-mail.</p> <p>13 Q. Okay.</p> <p>14 MS. HOUGHTON-LARSEN: We're</p> <p>15 ready for -- oh, perfect.</p> <p>16 (Whereupon, Plaintiffs'</p> <p>17 Exhibit 6, 10/15/2024 E-mail,</p> <p>18 Subject: Gift Tax Return, was marked</p> <p>19 for identification as of this date by</p> <p>20 the Reporter.)</p> <p>21 MS. HOUGHTON-LARSEN: Let's</p> <p>22 zoom in before I start asking any</p> <p>23 questions.</p> <p>24 Go up. Okay.</p> <p>25 Q. Dr. Ryan, can you see the --</p>	<p style="text-align: right;">Page 168</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 this document to Plaintiffs?</p> <p>3 MR. CAMMARATA: Objection.</p> <p>4 A. Why -- why would I?</p> <p>5 Q. I'm not really su- -- supposed</p> <p>6 to -- you're -- you're testifying, so I'm</p> <p>7 not really supposed to answer your</p> <p>8 questions.</p> <p>9 Could you please answer my</p> <p>10 question of whether you produced this</p> <p>11 document to Plaintiffs?</p> <p>12 A. I didn't --</p> <p>13 MR. CAMMARATA: Objection.</p> <p>14 A. -- have it anymore. It's not</p> <p>15 about --</p> <p>16 Q. Okay.</p> <p>17 A. -- me. It's having the mayor</p> <p>18 sign something, so I'm sure I got rid of it</p> <p>19 almost immediately.</p> <p>20 Q. When you mean -- when you say</p> <p>21 "get rid of it," do you mean deleted it?</p> <p>22 A. Yeah. I'm sure I got rid of</p> <p>23 anything that doesn't have to pertain to --</p> <p>24 to me. That's his business about his</p> <p>25 taxes.</p>
<p style="text-align: right;">Page 167</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 the document on your screen?</p> <p>3 A. Yes.</p> <p>4 Q. And this has been marked as</p> <p>5 Plaintiffs' Exhibit 6?</p> <p>6 A. Yeah.</p> <p>7 Q. Do you rec- -- do you recognize</p> <p>8 this document?</p> <p>9 A. That sounds familiar.</p> <p>10 Q. Okay. So do you see that this</p> <p>11 is a October 15th, 2024 e-mail from</p> <p>12 Joseph Ricci to you at</p> <p>13 mariaryannh@gmail.com; "Subject: Gift tax</p> <p>14 return."</p> <p>15 A. Yep.</p> <p>16 Q. Do you see that?</p> <p>17 A. Yep.</p> <p>18 Q. And do you see this says:</p> <p>19 "Hi Maria. Please see attached</p> <p>20 gift tax return. Please have RWG sign and</p> <p>21 date and mail to the address indicated</p> <p>22 today."</p> <p>23 Do you see that?</p> <p>24 A. Yep.</p> <p>25 Q. Do you know if you produced</p>	<p style="text-align: right;">Page 169</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 Q. Is it your regular practice to</p> <p>3 delete e-mails and documents as soon as you</p> <p>4 don't need them anymore?</p> <p>5 A. Yes.</p> <p>6 MR. CAMMARATA: Objection.</p> <p>7 A. Been like that my whole life.</p> <p>8 Q. Okay. Are you the same way</p> <p>9 with text messages?</p> <p>10 A. Yes, definitely. I -- I don't</p> <p>11 like all the mess of too many messages, so</p> <p>12 I like to -- if I was to talk to you, it</p> <p>13 would be deleted almost when I'm done</p> <p>14 talking to you.</p> <p>15 Q. For all communications or only</p> <p>16 business communications?</p> <p>17 MR. CAMMARATA: Objection.</p> <p>18 A. Pretty much all communications.</p> <p>19 Q. You testified earlier about</p> <p>20 Mr. Giuliani declaring bankruptcy.</p> <p>21 Do you recall that?</p> <p>22 A. I do.</p> <p>23 Q. Do you have an understanding of</p> <p>24 why Mr. Giuliani declared bankruptcy?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 170</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 MR. CAMMARATA: Objection.</p> <p>3 A. In -- in my opinion, I do, yes.</p> <p>4 Q. All right. Could you explain</p> <p>5 your opinion of why Mr. Giuliani declared</p> <p>6 bankruptcy, please?</p> <p>7 A. Well, he was in front of a</p> <p>8 crooked judge in Washington, D.C., and he</p> <p>9 was never allowed a trial. And because he</p> <p>10 got onslaugthed [sic] with document</p> <p>11 requests, thousands of pages, that the</p> <p>12 judge did a default hearing, and then there</p> <p>13 was a ridiculous -- \$148 million judgment.</p> <p>14 Well, the guy was -- is only</p> <p>15 worth his properties, so, yeah, he had to</p> <p>16 be forced into bankruptcy. That's my</p> <p>17 understanding.</p> <p>18 Q. Okay. Do you -- when did you</p> <p>19 become aware that Mr. Giuliani was going</p> <p>20 to -- or wanted to file bankruptcy?</p> <p>21 A. I don't recall.</p> <p>22 Q. Do you recall whether you were</p> <p>23 aware before Mr. Giuliani filed, or did you</p> <p>24 become aware afterwards?</p> <p>25 MR. CAMMARATA: Objection.</p>	<p style="text-align: right;">Page 172</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 to Mr. Giuliani's defense fund in exchange</p> <p>3 for him speaking there?</p> <p>4 MR. CAMMARATA: Objection.</p> <p>5 A. I don't know if I understand</p> <p>6 that.</p> <p>7 Q. Sure.</p> <p>8 So, my -- my question is: Is</p> <p>9 it your understanding that there was some</p> <p>10 sort of trade or exchange? Mr. Giuliani</p> <p>11 appeared at an event or did some type of</p> <p>12 speaking for Sheridan.Church, and then, in</p> <p>13 exchange, Sheridan.Church contributed to</p> <p>14 his legal defense? Is that your</p> <p>15 understanding?</p> <p>16 MR. CAMMARATA: Objection.</p> <p>17 A. It didn't seem like it was, you</p> <p>18 do this and we'll do that. It -- it was</p> <p>19 more like people are praying for you here,</p> <p>20 they see the miscarriage of justice, we'd</p> <p>21 like to invite you in a loving environment.</p> <p>22 And while they were doing the sermon, the</p> <p>23 pastor brought up his struggles and they</p> <p>24 put up the defense fund so people can</p> <p>25 contribute.</p>
<p style="text-align: right;">Page 171</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 A. I don't recall.</p> <p>3 Q. Okay.</p> <p>4 MS. HOUGHTON-LARSEN: Can we</p> <p>5 mark Tab C, please, Joanna? And I</p> <p>6 think it's Plaintiffs' Exhibit 7.</p> <p>7 Yes.</p> <p>8 (Whereupon, Plaintiffs'</p> <p>9 Exhibit 7, 12/18/2023 E-mail from</p> <p>10 Maria Ryan, Re: Bankruptcy, was</p> <p>11 marked for identification as of this</p> <p>12 date by the Reporter.)</p> <p>13 Q. While we're waiting for that to</p> <p>14 come up.</p> <p>15 Dr. Ryan, does Sheridan.Church</p> <p>16 in Tulsa ring a bell for you?</p> <p>17 A. It does.</p> <p>18 MR. CAMMARATA: Objection.</p> <p>19 Q. Do you recall whether</p> <p>20 Sheridan.Church is a place where</p> <p>21 Mr. Giuliani has done paid speaking?</p> <p>22 A. He has not done paid speaking,</p> <p>23 but he has been invited there, and they</p> <p>24 contributed to his defense fund.</p> <p>25 Q. Did Sheridan.Church contribute</p>	<p style="text-align: right;">Page 173</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 Q. Did you travel to -- were you</p> <p>3 also present at Sheridan.Church at that</p> <p>4 time you were just describing?</p> <p>5 A. I was.</p> <p>6 Q. Did Sheridan.Church pay for</p> <p>7 your and Mr. Giuliani's travel to and from</p> <p>8 Tulsa?</p> <p>9 A. They did.</p> <p>10 Q. Do you recall arranging that</p> <p>11 travel with Sheridan.Church?</p> <p>12 MR. CAMMARATA: Objection.</p> <p>13 A. I -- they -- they arranged it,</p> <p>14 but I'm aware of it, yes.</p> <p>15 Q. And do you recall, like,</p> <p>16 Sheridan.Church sending you flight</p> <p>17 information or hotel information for your</p> <p>18 trip?</p> <p>19 A. I'm sure they did.</p> <p>20 Q. Okay.</p> <p>21 MS. HOUGHTON-LARSEN: So if we</p> <p>22 could pull up this document, Joanna,</p> <p>23 it should be Exhibit 7.</p> <p>24 You can see it's marked</p> <p>25 Exhibit 7, and then I'll zoom in.</p>

<p style="text-align: right;">Page 258</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 And then there are 15 requests.</p> <p>3 Do you see that?</p> <p>4 A. I do.</p> <p>5 Q. Okay. And does this refresh</p> <p>6 your recollection regarding this document?</p> <p>7 A. It doesn't. When I was</p> <p>8 notified that there was questions, I think</p> <p>9 I only got the questions.</p> <p>10 Q. Okay. And do you recall who</p> <p>11 you got the questions from?</p> <p>12 MR. CAMMARATA: Objection.</p> <p>13 Q. Dr. Ryan?</p> <p>14 A. I believe I was notified by</p> <p>15 Gary Rosen.</p> <p>16 Q. Okay.</p> <p>17 MS. HOUGHTON-LARSEN: Okay. So</p> <p>18 let's go -- let's mark Tab 33,</p> <p>19 Joanna. And I -- I don't think that</p> <p>20 we can have both documents up at</p> <p>21 the -- on the screen at both times,</p> <p>22 but we'll see how this goes.</p> <p>23 This actually, probably, will</p> <p>24 take a few minutes, so if you want to</p> <p>25 take a break to use the ladies' room</p>	<p style="text-align: right;">Page 260</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 The time is 2:46 P.M.</p> <p>3 MS. HOUGHTON-LARSEN: I'm --</p> <p>4 okay.</p> <p>5 So we were about to pull up,</p> <p>6 Joanna, as an exhibit Tab 33, which</p> <p>7 is Plaintiffs' Exhibit -- I don't</p> <p>8 know. You'll tell me.</p> <p>9 MS. LAMBERTA: It's going to be</p> <p>10 27. One of them is just out of</p> <p>11 order, so this is 27 and then,</p> <p>12 there'll be a 26.</p> <p>13 MS. HOUGHTON-LARSEN: Okay.</p> <p>14 (Whereupon, Plaintiffs'</p> <p>15 Exhibit 27, Document Request</p> <p>16 Response, was marked for</p> <p>17 identification as of this date by the</p> <p>18 Reporter.)</p> <p>19 Q. Okay. So this has been marked</p> <p>20 Plaintiffs' Exhibit 27.</p> <p>21 MS. HOUGHTON-LARSEN: Can you</p> <p>22 zoom in?</p> <p>23 Q. First of all, Dr. Ryan, can you</p> <p>24 see this document on your screen?</p> <p>25 A. Yes, I can. But I'm very happy</p>
<p style="text-align: right;">Page 259</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 or get a water or anything, now would</p> <p>3 be a good time.</p> <p>4 THE WITNESS: Okay. I think I</p> <p>5 will go to the ladies' room.</p> <p>6 MS. HOUGHTON-LARSEN: Okay.</p> <p>7 It's 2:37 -- oh, let's just wait --</p> <p>8 oh, sorry, Dr. Ryan.</p> <p>9 THE WITNESS: Oh.</p> <p>10 MS. HOUGHTON-LARSEN: Let's</p> <p>11 just wait for Jeremy to take us off</p> <p>12 the record.</p> <p>13 THE WITNESS: Okay.</p> <p>14 MS. HOUGHTON-LARSEN: And we'll</p> <p>15 come back maybe at 2:45.</p> <p>16 THE WITNESS: Okay.</p> <p>17 THE VIDEOGRAPHER: This is the</p> <p>18 end -- end of Media Unit Number 4.</p> <p>19 We're going off record.</p> <p>20 The time is 2:38 P.M.</p> <p>21 (Whereupon, a short recess was</p> <p>22 taken.)</p> <p>23 THE VIDEOGRAPHER: This is the</p> <p>24 start of Media Unit Number 5.</p> <p>25 We are back on the record.</p>	<p style="text-align: right;">Page 261</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 I responded to that request. I wasn't sure</p> <p>3 if I did or didn't.</p> <p>4 Q. Okay. So you can -- do you</p> <p>5 recognize this document?</p> <p>6 A. I do.</p> <p>7 Q. Okay. And what is it?</p> <p>8 A. It's the response to the</p> <p>9 document request.</p> <p>10 Q. Okay. So what I'd like to do</p> <p>11 is I'd just like to go through the specific</p> <p>12 questions and then your answers. And so,</p> <p>13 I'm going to read from Exhibit 25 the</p> <p>14 questions. If you want them pulled up on</p> <p>15 the screen, we'll just have to go back and</p> <p>16 forth.</p> <p>17 So Document Request 1 is:</p> <p>18 "All documents and</p> <p>19 communications relating to the nature of</p> <p>20 Mr. Giuliani's use and occupancy of the</p> <p>21 Palm Beach condo, including his purported</p> <p>22 intention to establish it as a permanent</p> <p>23 residence."</p> <p>24 Okay?</p> <p>25 A. Okay.</p>

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<p style="text-align: right;">Page 262</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 Q. And then, if we look at this</p> <p>3 document, your answer is:</p> <p>4 "Attached is an email between</p> <p>5 Southeby's [sic] and myself."</p> <p>6 Do you see that?</p> <p>7 A. Uh-hum. Yes.</p> <p>8 Q. And do you understand that in</p> <p>9 response to Document Request 1, you only</p> <p>10 produced one e-mail between Sotheby's and</p> <p>11 yourself?</p> <p>12 A. Yes. I was aware of that.</p> <p>13 Q. And is it your testimony that</p> <p>14 no -- you do not have any other documents</p> <p>15 that are responsive to that request?</p> <p>16 A. When it comes to the</p> <p>17 homesteading, I don't have -- no. It would</p> <p>18 be the real estate agreement.</p> <p>19 Q. And so, just so I'm clear.</p> <p>20 It's your testimony that you</p> <p>21 don't have any texts or e-mails, phone</p> <p>22 records or anything, moving documents,</p> <p>23 invoices relating to Mr. Giuliani's use and</p> <p>24 occupancy of the Palm Beach condo other</p> <p>25 than this Sotheby's e-mail?</p>	<p style="text-align: right;">Page 264</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 And then, your answer to</p> <p>3 Document Request Number 2 is:</p> <p>4 "This is an overburdensome</p> <p>5 request. The honorable Rudolph Giuliani</p> <p>6 travels for his business. The company</p> <p>7 hiring him typically pays for his travel</p> <p>8 which includes his staff.</p> <p>9 "Mr. Mike Lindell already made</p> <p>10 it public that his organization paid for</p> <p>11 the mayor and his staff to attend the RNC</p> <p>12 and DNC as part of his role with</p> <p>13 FrankSpeech TV?"</p> <p>14 Do you see that?</p> <p>15 A. Uh-hmm.</p> <p>16 Q. And do you understand that you</p> <p>17 didn't produce any documents in response to</p> <p>18 that request?</p> <p>19 A. Yes. I -- I absolutely</p> <p>20 recognize that. I -- I told you how it</p> <p>21 typically works.</p> <p>22 Q. Okay. And just so I'm clear.</p> <p>23 Is it your testimony that you</p> <p>24 don't have a single document responsive to</p> <p>25 Request Number 2?</p>
<p style="text-align: right;">Page 263</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 A. No. I wouldn't have anything</p> <p>3 personal about his -- I -- I totally don't</p> <p>4 even get why I would be asked about his</p> <p>5 stuff with the Palm Beach condo. I don't</p> <p>6 have anything on his Palm -- Palm Beach</p> <p>7 condo.</p> <p>8 Q. Okay.</p> <p>9 MS. HOUGHTON-LARSEN: Let's go</p> <p>10 to -- and let's -- zoom in, Joanna,</p> <p>11 and so we can go document request by</p> <p>12 document request just so it's a</p> <p>13 little easier -- there you go, it's a</p> <p>14 little easier to see.</p> <p>15 Q. So reading from Plaintiffs'</p> <p>16 Exhibit 25, Document Request 2 is for</p> <p>17 documents and communications relating to</p> <p>18 Mr. Giuliani's travel between July 1st,</p> <p>19 2023 and August 8th, 2024. It seeks all</p> <p>20 conversations relating to travel plans and</p> <p>21 logistics"... such as credit card</p> <p>22 statements, receipts, reimbursements,</p> <p>23 itineraries, airline or train tickets, car</p> <p>24 rental reservations, lodging bookings or</p> <p>25 lodging folios."</p>	<p style="text-align: right;">Page 265</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 A. I don't believe I do.</p> <p>3 MR. CAMMARATA: Objection.</p> <p>4 Q. Okay. Going to Document</p> <p>5 Request Number 3:</p> <p>6 "All physical or electronic</p> <p>7 calendars or schedules reflecting</p> <p>8 Defendant's travel or whereabouts</p> <p>9 throughout 2024."</p> <p>10 And your response is:</p> <p>11 "There are no responsive</p> <p>12 documents to this request."</p> <p>13 A. Yes. You are aware --</p> <p>14 Q. Is that correct?</p> <p>15 A. -- he has -- you are aware of</p> <p>16 that. You're aware of the wall calendar.</p> <p>17 Q. Okay. Document Request 4 is</p> <p>18 for:</p> <p>19 "Documents or communication</p> <p>20 sufficient to show the location of</p> <p>21 Defendant's Sensitive Personal</p> <p>22 Property..." , which I will tell you is</p> <p>23 defined as:</p> <p>24 Mr. Giuliani's"... passport,</p> <p>25 birth certificate, will, trust documents,</p>


<p style="text-align: right;">Page 266</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 divorce records, personal and family</p> <p>3 heirlooms, and sports memorabilia."</p> <p>4 And your response is:</p> <p>5 "Skyline but I do not know the</p> <p>6 address."</p> <p>7 Do you see that?</p> <p>8 A. Yep.</p> <p>9 Q. And then you say:</p> <p>10 "Corporate Transfer in</p> <p>11 Ronkonkoma."</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. Is it your testimony that</p> <p>15 Mr. Giuliani keeps his sensitive personal</p> <p>16 property, such as his passport, birth</p> <p>17 certificate, will, trust documents, divorce</p> <p>18 records, personal and family heirlooms and</p> <p>19 sports memorabilia, at storage facilities?</p> <p>20 MR. CAMMARATA: Objection.</p> <p>21 A. I have no idea. I think I</p> <p>22 misunderstood that question. I -- I would</p> <p>23 have to -- I should have said, "I don't</p> <p>24 know".</p> <p>25 Q. Okay.</p>	<p style="text-align: right;">Page 268</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 A. Yes. I thought I had -- I saw</p> <p>3 it somewhere, but it could've been from his</p> <p>4 attorney, an invoice from Corporate, but</p> <p>5 when I went to look in the e-mail, I</p> <p>6 couldn't find any.</p> <p>7 Q. Okay. So when it says:</p> <p>8 "Put in invoice from</p> <p>9 corporate..." in parenthesis, did you write</p> <p>10 that as a note --</p> <p>11 A. I did.</p> <p>12 Q. -- to yourself?</p> <p>13 A. That was a note to myself.</p> <p>14 Q. All right.</p> <p>15 A. Because I thought --</p> <p>16 Q. Okay.</p> <p>17 A. -- I had it, but then I</p> <p>18 remembered I was shown on a screen the</p> <p>19 invoice, so I actually never had it in my</p> <p>20 possession.</p> <p>21 Q. So, okay, let's go to Document</p> <p>22 Request 8:</p> <p>23 "All documents and</p> <p>24 communications relating to Standard USA,</p> <p>25 LLC in any way, including but not limited</p>
<p style="text-align: right;">Page 267</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 A. I thought I was asking about</p> <p>3 what storage facilities he had, so I</p> <p>4 apologize for that.</p> <p>5 But I don't know where he keeps</p> <p>6 his personal documents.</p> <p>7 Q. I understand.</p> <p>8 Let's go to Document Request 7,</p> <p>9 and that says:</p> <p>10 "All documents and</p> <p>11 communications relating to the storage of</p> <p>12 property at Corporate Transfer Storage</p> <p>13 Inc., America First Warehouse and Sky Line</p> <p>14 Warehouse...including but not limited to</p> <p>15 contracts, invoices, payments, access to or</p> <p>16 the transference of any of the properties</p> <p>17 stored at either location."</p> <p>18 And your answer has, in</p> <p>19 parenthesis:</p> <p>20 "Put in invoice from</p> <p>21 corporate..."</p> <p>22 And then, outside of</p> <p>23 parenthesis:</p> <p>24 "...I cannot find the invoice."</p> <p>25 Do you see that?</p>	<p style="text-align: right;">Page 269</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 to its formation, corporate structure,</p> <p>3 owners, members, financial records, bank</p> <p>4 account, assets, debts, loans, payments,</p> <p>5 profits, property, financial transactions,</p> <p>6 and total, yearly and monthly revenue."</p> <p>7 And in response to Document</p> <p>8 Request Number 8, you write:</p> <p>9 "Standard USA, LLC had to form</p> <p>10 because you illegally seized the money for</p> <p>11 Giuliani Communications and employees did</p> <p>12 not get paid for two months."</p> <p>13 Do you see that?</p> <p>14 A. Yes. It was very shameful.</p> <p>15 Q. And do you understand that you</p> <p>16 didn't produce a single document in</p> <p>17 response to Document Request Number 8?</p> <p>18 MR. CAMMARATA: Objection.</p> <p>19 A. Well, I -- I was told that you</p> <p>20 already had the Standard USA corporate</p> <p>21 structure.</p> <p>22 Q. Who told you that?</p> <p>23 MR. CAMMARATA: Objection.</p> <p>24 A. An attorney.</p> <p>25 Q. Not your attorney?</p>

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<p style="text-align: right;">Page 270</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 A. No. I just hired Adam when I</p> <p>3 found out I had to be deposed.</p> <p>4 Q. Okay. So was it one of</p> <p>5 Mr. Giuliani's attorneys who told you?</p> <p>6 A. I believe so.</p> <p>7 MR. CAMMARATA: Don't guess.</p> <p>8 A. I don't know then.</p> <p>9 Q. And you testified earlier in</p> <p>10 today's deposition that you have access via</p> <p>11 an online portal to the iTHINK bank account</p> <p>12 held by Standard USA; correct?</p> <p>13 A. Yes.</p> <p>14 Q. And in response to this</p> <p>15 document subpoena, you didn't produce any</p> <p>16 of those online banking records, did you?</p> <p>17 A. I did not. And I did not have</p> <p>18 an attorney at that time. And I would have</p> <p>19 to discuss that with Adam, because I'm</p> <p>20 having a hard time wrapping around my head</p> <p>21 what business is it of yours.</p> <p>22 And I don't want anybody else</p> <p>23 hurt by the antics of Willkie Farr &</p> <p>24 Gallagher.</p> <p>25 So somebody's private bank</p>	<p style="text-align: right;">Page 272</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 MR. CAMMARATA: Objection.</p> <p>3 A. I know what I would get for</p> <p>4 direct deposit, yes.</p> <p>5 Q. You have access to your own</p> <p>6 bank accounts online?</p> <p>7 A. I do.</p> <p>8 Q. And those bank account</p> <p>9 statements reflect money that you were paid</p> <p>10 by Giuliani Communications?</p> <p>11 A. Yes.</p> <p>12 Q. And you didn't produce any of</p> <p>13 those documents in response to this</p> <p>14 request?</p> <p>15 A. I didn't. Same -- same answer.</p> <p>16 I felt like what I earn is my</p> <p>17 business. I'm not under indictment for</p> <p>18 anything. And I find that quite abusive.</p> <p>19 So now that I have an attorney,</p> <p>20 I will discuss that with my attorney.</p> <p>21 Q. Document Request 14 asks:</p> <p>22 "All documents and</p> <p>23 communications relating to the transfer of</p> <p>24 any money or property from you to..."</p> <p>25 Mr. Giuliani or Mr. Giuliani "...to you."</p>
<p style="text-align: right;">Page 271</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 information, I -- I don't get why that's</p> <p>3 got to do with his homesteading. And so I</p> <p>4 would have to seek counsel. I did not have</p> <p>5 counsel when I filled these out.</p> <p>6 Q. And Document Request 9 asks:</p> <p>7 "All documents and</p> <p>8 communications relating to</p> <p>9 Giuliani Communications LLC in any way,</p> <p>10 including but not limited to its corporate</p> <p>11 structure, owners, members, financial</p> <p>12 records, bank accounts, assets, debts,</p> <p>13 loans, payments, profits, property,</p> <p>14 financial transactions, and total, yearly</p> <p>15 and monthly revenue."</p> <p>16 Do you --</p> <p>17 A. I don't any --</p> <p>18 Q. -- have in your response --</p> <p>19 A. I don't have any documents.</p> <p>20 Q. Pardon?</p> <p>21 A. I don't have any documents</p> <p>22 relating to that.</p> <p>23 Q. Do you have any documents</p> <p>24 showing your salary payments for</p> <p>25 Giuliani Communications?</p>	<p style="text-align: right;">Page 273</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 This includes gifts, payment of</p> <p>3 expenses, travel, day-to-day expenses,</p> <p>4 meals, lodging, dry cleaning, or clothing.</p> <p>5 And in response to this, you</p> <p>6 write:</p> <p>7 "Have you ever picked up a tab</p> <p>8 at a restaurant? In the past, sometimes I</p> <p>9 would do it for the staff and other times</p> <p>10 the mayor would do it. I do not know the</p> <p>11 dates nor do I have receipts."</p> <p>12 A. That's right.</p> <p>13 Q. Is that correct?</p> <p>14 A. That's very honest, yeah.</p> <p>15 Q. Okay.</p> <p>16 A. Yeah --</p> <p>17 Q. You think that that</p> <p>18 information -- pardon me. I don't mean to</p> <p>19 cut you off. I'm sorry, Dr. Ryan.</p> <p>20 A. No.</p> <p>21 I don't save anything. It's</p> <p>22 pretty fluid. Yeah. So everybody helps</p> <p>23 each other out. Sometimes Ted picks up a</p> <p>24 meal or two, if it's McDonald's.</p> <p>25 So I -- I -- it's so hard,</p>

<p style="text-align: right;">Page 274</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 these everyday things. I -- I am -- I'd</p> <p>3 would be surprised if you kept the receipts</p> <p>4 for that.</p> <p>5 Q. Do you recall earlier today we</p> <p>6 looked at a document, an e-mail between you</p> <p>7 and Joe Ricci --</p> <p>8 A. Yes.</p> <p>9 Q. -- in which you were referring</p> <p>10 to a payment --</p> <p>11 A. Yep.</p> <p>12 Q. -- that you made --</p> <p>13 A. Yep.</p> <p>14 Q. -- for Mr. Giuliani's</p> <p>15 medication?</p> <p>16 A. Yep.</p> <p>17 Q. Did you produce that document</p> <p>18 to Plaintiffs?</p> <p>19 A. No.</p> <p>20 I don't have it.</p> <p>21 Q. Document Request 15 asks for:</p> <p>22 "Document or communications</p> <p>23 relating to agreements or contracts that</p> <p>24 relate in any way to assets or property..."</p> <p>25 possessed by Mr. Giuliani with</p>	<p style="text-align: right;">Page 276</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 A. Yes.</p> <p>3 Q. Did you produce that document</p> <p>4 to Plaintiffs?</p> <p>5 A. I did not.</p> <p>6 Q. Do you recall earlier today we</p> <p>7 looked at a document about a contract with</p> <p>8 a man named Igor for \$100,000.00?</p> <p>9 MR. CAMMARATA: Objection.</p> <p>10 A. That was in 2021. That was not</p> <p>11 asked of me.</p> <p>12 Q. Okay. Thank you.</p> <p>13 MS. HOUGHTON-LARSEN: So just</p> <p>14 to close the loop on this, let's look</p> <p>15 at document -- Tab 32, Joanna.</p> <p>16 And this is Plaintiffs'</p> <p>17 Exhibit 26.</p> <p>18 (Whereupon, Plaintiffs'</p> <p>19 Exhibit 26, E-mail Chain, was marked</p> <p>20 for identification as of this date by</p> <p>21 the Reporter.)</p> <p>22 Q. Dr. Ryan, do you recognize this</p> <p>23 document? It's the single document you</p> <p>24 produced to Plaintiffs in response to</p> <p>25 Plaintiffs' document request?</p>
<p style="text-align: right;">Page 275</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 "...agreements and contracts with Corporate</p> <p>3 Transfer Storage...for the moving and</p> <p>4 storage of..." Mr. Giuliani's "...physical</p> <p>5 property."</p> <p>6 And your response is:</p> <p>7 "See attached invoice. I</p> <p>8 cannot find the invoice."</p> <p>9 A. Same thing. I thought I may</p> <p>10 have the invoice, but when it came down to</p> <p>11 it, I was just shown the invoice over a</p> <p>12 screen, and I had never had it in my</p> <p>13 physical possession. And there was never</p> <p>14 a --</p> <p>15 Q. Do you recall a --</p> <p>16 MR. CAMMARATA: Objection.</p> <p>17 Q. Do you recall earlier --</p> <p>18 MS. HOUGHTON-LARSEN:</p> <p>19 Mr. Cammarata, what are you objecting</p> <p>20 to? I didn't ask the question.</p> <p>21 MR. CAMMARATA: Yeah. I</p> <p>22 withdraw it.</p> <p>23 Q. Dr. Ryan, do you recall earlier</p> <p>24 today you were talking about a contract</p> <p>25 with Burke Brands coffee?</p>	<p style="text-align: right;">Page 277</p> <p>1 CONFIDENTIAL ~ DR. MARIA RYAN</p> <p>2 A. What's that? What was the</p> <p>3 question?</p> <p>4 Q. Do you recognize this document</p> <p>5 as the single document that was in response</p> <p>6 to Plaintiffs -- that you produced in</p> <p>7 response to Plaintiffs' document request?</p> <p>8 A. I recognize it -- yes.</p> <p>9 Q. When you received the document</p> <p>10 request or became aware of it, did you take</p> <p>11 steps to search your files?</p> <p>12 A. I did. I did. I put in the</p> <p>13 search thing on the top, and that's how I</p> <p>14 was surprised I had anything from Sotheby's</p> <p>15 anymore, actually.</p> <p>16 But, yes, I did.</p> <p>17 Q. Do you recall what search terms</p> <p>18 you used?</p> <p>19 A. I did Corporate -- depending on</p> <p>20 the question, I remember doing "Skyline,"</p> <p>21 "Corporate Transfer," and other things like</p> <p>22 that, depending on the question.</p> <p>23 Q. Okay. And did you produce to</p> <p>24 Plaintiffs every document that showed up</p> <p>25 when you did those searches?</p>

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<p style="text-align: right;">Page 314</p> <p>1</p> <p>2 EXHIBITS (cont'd)</p> <p>3 Exh 17 Giuliani Apartment Library 213</p> <p>4 Photo</p> <p>5</p> <p>6 Exh 18 Giuliani Apartment Kitchen 217</p> <p>7 Photo</p> <p>8 Exh 19 8/8/2024 E-mail 219</p> <p>9 Exh 20 Calendar 226</p> <p>10 Exh 21 Redacted Handwritten 229</p> <p>11 Calendar Reminders</p> <p>12</p> <p>13 Exh 22 Response to Information 233</p> <p>14 Subpoena</p> <p>15 Exh 23 Information Subpoena 249</p> <p>16 with Restraining Notice</p> <p>17 pursuant to CPLR Sections</p> <p>18 5222 and 5224</p> <p>19</p> <p>20 Exh 24 Questions in Connection 253</p> <p>21 With information Subpoena</p> <p>22 to</p> <p>23 Standard USA LLC</p> <p>24 Exh 25 Subpoena to Produce 255</p> <p>25 Documents, Information, or</p> <p>Objects</p> <p>or to Permit Inspection of</p> <p>Premises in a Civil Action</p> <p>Exh 26 E-mail Chain 276</p> <p>Exh 27 Document Request Response 260</p> <p>Exh 28 Defendants' [sic] response 280</p> <p>to Plaintiffs' First Set of</p> <p>Interrogatories</p> <p>Exh 29 Defendant's Amended Initial 288</p> <p>Disclosures Pursuant to</p> <p>Federal Rules of Civil</p> <p>Procedure Rule 26(a)(1)</p>	<p style="text-align: right;">Page 316</p> <p>1</p> <p>2 INDEX</p> <p>3 WITNESS: MARIA RYAN</p> <p>4</p> <p>5 EXAMINATION BY PAGE</p> <p>6 MS. HOUGHTON-LARSEN 8</p> <p>7</p> <p>8 INFORMATION AND/OR DOCUMENTS REQUESTED</p> <p>9 None</p> <p>10</p> <p>11 QUESTIONS MARKED FOR RULINGS</p> <p>12 None</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 315</p> <p>1</p> <p>2 EXHIBITS (cont'd)</p> <p>3 Exh 30 Certification that Response 295</p> <p>4 is Correct and Complete</p> <p>5</p> <p>6 Exh 31 Defendant Rudolph W. 296</p> <p>7 Giuliani's Pretrial</p> <p>8 Disclosures Pursuant to</p> <p>9 Federal Rule of Civil</p> <p>10 Procedure 26(a)(3)</p> <p>11</p> <p>12 (Exhibits retained by Exhibit Share.)</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 317</p> <p>1</p> <p>2 CERTIFICATE</p> <p>3</p> <p>4 STATE OF NEW YORK)</p> <p>5 : SS.:</p> <p>6 COUNTY OF NEW YORK)</p> <p>7</p> <p>8 I, KARYN CHIOUSANO, a Notary Public</p> <p>9 for and within the State of New York, do</p> <p>10 hereby certify:</p> <p>11 That the witness whose examination is</p> <p>12 hereinbefore set forth was duly sworn and</p> <p>13 that such examination is a true record of</p> <p>14 the testimony given by that witness.</p> <p>15 I further certify that I am not</p> <p>16 related to any of the parties to this</p> <p>17 action by blood or by marriage and that I</p> <p>18 am in no way interested in the outcome of</p> <p>19 this matter.</p> <p>20 IN WITNESS WHEREOF, I have hereunto</p> <p>21 set my hand this 1st day of January, 2025.</p> <p>22</p> <p>23 </p> <p>24 KARYN CHIOUSANO</p> <p>25</p>